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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

APR 14 2021

SEAN F. McAVOY, CLERK
SPOKANE, WASHINGTON DEPUTY

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

No. 4:21-CR-6008-SMJ

Plaintiff,

SUPERSEDING INDICTMENT

v.
14 JONATHAN SCOTT ARD,
15 JORDIN LEMUS,
16 JERROD JUSTIN HALE, and
17 JASMINE MARIE CAMPBELL (a/k/a
"Lucas")

Vio: 21 U.S.C. §§ 841(a)(1),
(b)(1)(A)(vi), (viii), 846
Conspiracy to Distribute 400
grams or more of Fentanyl and
50 Grams or more of Actual
(Pure) Methamphetamine
(Count 1)

Defendants.

21 U.S.C. § 841(a)(1),
(b)(1)(B)(vi), 18 U.S.C. § 2
Possession with the Intent to
Distribute 40 Grams or more of
Fentanyl
(Counts 2, 3)

21 U.S.C. § 841(a)(1), (b)(1)(C),
18 U.S.C. § 2
Possession with the Intent to
Distribute Heroin
(Count 4)

21 U.S.C. § 841(a)(1),
(b)(1)(A)(vi), 18 U.S.C. § 2
Possession with the Intent to

1 Distribute 400 Grams or more of
2 Fentanyl
3 (Count 5)

4 21 U.S.C. § 841(a)(1),
5 (b)(1)(A)(viii), 18 U.S.C. § 2
6 Possession with the Intent to
7 Distribute 50 Grams or more of
8 Actual (Pure) Methamphetamine
9 (Count 6)

10 18 U.S.C. §§ 922(g)(1),
11 924(a)(2)
12 Felon in Possession of a Firearm
13 (Counts 7, 8)

14 18 U.S.C. § 924(d), 21 U.S.C. §
15 853, 28 U.S.C. § 2461
16 Forfeiture Allegations

17 COUNT 1

18 Beginning on a date unknown, but by December 2020, and continuing until
19 on or about April 13, 2021, in the Eastern District of Washington and elsewhere,
20 the Defendants, JONATHAN SCOTT ARD, JORDIN LEMUS, JERROD JUSTIN
21 HALE, and JASMINE MARIE CAMPBELL (a/k/a “Lucas”), and other
22 individuals, both known and unknown to the Grand Jury, did knowingly and
23 intentionally combine, conspire, confederate and agree together with each other to
24 commit the following offense: distribution of 50 grams or more of actual (pure)
25 methamphetamine and 400 grams or more of a mixture or substance containing a
26 detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide
27 (a/k/a “Fentanyl”), a Schedule II controlled substance, in violation of 21 U.S.C.
28 §§ 841(a)(1), (b)(1)(A)(viii) and (vi), 846.

1 COUNT 2

2 On or about December 13, 2020, in the Eastern District of Washington, the
3 Defendant, JONATHAN SCOTT ARD, knowingly and intentionally possessed
4 with intent to distribute 40 grams or more of a mixture or substance containing a
5 detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide
6 (a/k/a “Fentanyl”), a Schedule II controlled substance, in violation of 21 U.S.C.
7 § 841(a)(1), (b)(1)(B)(vi), and 18 U.S.C. § 2.

8 COUNT 3

9 On or about March 3, 2021, in the Eastern District of Washington, the
10 Defendant, JONATHAN SCOTT ARD, knowingly and intentionally possessed
11 with intent to distribute 40 grams or more of a mixture or substance containing a
12 detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide
13 (a/k/a “Fentanyl”), a Schedule II controlled substance, in violation of 21 U.S.C. §
14 841(a)(1), (b)(1)(B)(vi), and 18 U.S.C. § 2.

16 COUNT 4

17 On or about March 3, 2021, in the Eastern District of Washington, the
18 Defendant, JONATHAN SCOTT ARD, knowingly and intentionally possessed
19 with intent to distribute a mixture or substance containing a detectable amount of
20 heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1),
21 (b)(1)(C) and 18 U.S.C. § 2.

22 COUNT 5

23 On or about March 3, 2021, in the Eastern District of Washington, the
24 Defendant, JERROD JUSTIN HALE, knowingly and intentionally possessed with
25 intent to distribute 400 grams or more of a mixture or substance containing a
26 detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide
27 (a/k/a “Fentanyl”), a Schedule II controlled substance, in violation of 21 U.S.C. §
28 841(a)(1), (b)(1)(A)(vi), and 18 U.S.C. § 2.

1 COUNT 6
2

3 On or about March 3, 2021, in the Eastern District of Washington, the
4 Defendant, JERROD JUSTIN HALE, knowingly and intentionally possessed with
5 intent to distribute 50 grams or more of actual (pure) methamphetamine, a
6 Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1),
7 (b)(1)(A)(viii), and 18 U.S.C. § 2.

8 COUNT 7
9

10 On or about March 3, 2021, in the Eastern District of Washington, the
11 Defendant, JONATHAN SCOTT ARD, knowing of his status as a person
12 previously convicted of a crime punishable by imprisonment for a term exceeding
13 one year, did knowingly possess a firearm in and affecting commerce, to wit: a
14 Springfield XDM .40 caliber pistol, bearing serial number MG141882, which
15 firearm had theretofore been transported in interstate and/or foreign commerce, in
violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2).

16 COUNT 8
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18 On or about March 3, 2021, in the Eastern District of Washington, the
19 Defendant, JERROD JUSTIN HALE, knowing of his status as a person previously
20 convicted of a crime punishable by imprisonment for a term exceeding one year,
21 did knowingly possess a firearm in and affecting commerce, to wit: a Ruger LCP
22 .380 caliber pistol, bearing serial number 371903965, which firearm had
23 theretofore been transported in interstate and/or foreign commerce, in violation of
24 18 U.S.C. §§ 922(g)(1), 924(a)(2).

25 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS
26

27 The allegations contained in this Superseding Indictment are hereby re-
alleged and incorporated by reference for the purpose of alleging forfeitures.

28 Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of 21
U.S.C. § 841, as charged in Counts 1 – 6 of this Superseding Indictment, the
Defendants, JONATHAN SCOTT ARD (Counts 1 – 4); JORDIN LEMUS (Count 1);

JERROD JUSTIN HALE (Counts 1, 5, and 6); and, JASMINE CAMPBELL. (a/k/a “Lucas”) (Count 1), shall forfeit to the United States of America, any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense and any property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the offense. The property to be forfeited includes, but is not limited to, the following listed assets:

Defendant JONATHAN SCOTT ARD:

- a Springfield XDM .40 caliber pistol, bearing serial number MG141882 loaded with one round of .40 caliber ammunition; and,
- Any and all seized ammunition and accessories, including:
three (3) .40 caliber rounds of ammunition and a loaded magazine.

Defendant JERROD JUSTIN HALE:

- \$8,942.00 U.S. currency; and,
- a Ruger LCP .380 caliber pistol, bearing serial number 371903965.
- any and all seized ammunition and accessories, including:
Forty-nine (49) .380 rounds with a stamp of *I*;
Forty (40) .380 rounds with a stamp of “Federal Auto”;
Thirty-five (35) .380 rounds with a stamp of “Win Auto”; and,
Twenty-six (26) .380 rounds with a stamp of “ACP Tulammo”.
all contained in a black case; and,
Fifteen (15) loose rounds of .380 ammo stamped “Win Auto”; and,
a loaded magazine.

If any forfeitable property, as a result of any act or omission of the

Defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

Pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), upon conviction of an offense in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2), as set forth in Counts 7 and 8 of this Superseding Indictment, Defendants, JONATHAN SCOTT ARD (Count 7) and JERROD JUSTIN HALE (Count 8), shall forfeit to the United States of America, any firearms and ammunition involved or used in the commission of the offense, including, but not limited to:

Defendant JONATHAN SCOTT ARD:

- a Springfield XDM .40 caliber pistol, bearing serial number MG141882 loaded with one round of .40 caliber ammunition; and,
- any and all seized ammunition and accessories, including:
three (3) .40 caliber rounds of ammunition and a loaded magazine.

Defendant JERROD JUSTIN HALE:

- a Ruger LCP .380 caliber pistol, bearing serial number 371903965.
- a Ruger LCP .380 caliber pistol, bearing serial number 371903965.
- any and all seized ammunition and accessories, including:
 - Forty-nine (49) .380 rounds with a stamp of *I*;
 - Forty (40) .380 rounds with a stamp of “Federal Auto”;
 - Thirty-five (35) .380 rounds with a stamp of “Win Auto”; and,
 - Twenty-six (26) .380 rounds with a stamp of “ACP Tulammo.

all contained in a black case; and,

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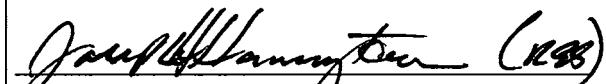
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1 Fifteen (15) loose rounds of .380 ammo stamped "Win Auto"; and,
2 a loaded magazine.

3 DATED this 14 day of April 2021.

4 A TRUE BILL
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Porteperson


Joseph H. Harrington (KSS)

Acting United States Attorney



Stephanie Van Marter
Assistant United States Attorney